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Attorneys for Defendants  
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EXCHANGE, and TRUCK INSURANCE  
EXCHANGE

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

RONALD STALLONE, on behalf of himself  
and all other persons similarly situated,

Plaintiff,

v.

FARMERS GROUP, INC., a Nevada  
Corporation; FARMERS INSURANCE  
EXCHANGE; and 21<sup>st</sup> CENTURY  
INSURANCE COMPANY,

Defendants.

Case No. 2:21-cv-01659-GMN-VCF

**STIPULATION AND ~~PROPOSED~~  
ORDER FOR EXTENSION OF TIME  
TO RESPOND TO PLAINTIFF'S  
AMENDED COMPLAINT**

**(FIRST REQUEST)**

Defendants Farmers Group, Inc., Farmers Insurance Exchange, and 21st Century Insurance Company ("21st Century") (collectively, "Defendants") and Plaintiff Ronald Stallone ("Plaintiff") hereby submit this stipulation and proposed order to (1) set February 8, 2022 as the deadline for all three Defendants to respond to the recently filed Amended Complaint and (2) set a modified briefing schedule for Defendants' forthcoming motion to dismiss. Because 21st

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Century is a newly named Defendant, and was only recently served with the Amended Complaint, it requires time respond thereto. The other two defendants, however—Farmers Group, Inc. and Farmers Insurance Exchange—are currently required to respond to the Amended Complaint on January 21, 2022, which is well before 21st Century’s February 8, 2022 deadline. All three Defendants are represented by the same counsel and wish to jointly respond to the Amended Complaint through a single motion to dismiss. The parties accordingly submit this stipulation to set a single coordinated briefing schedule in order to avoid piecemeal motions practice and the Court having to consider multiple overlapping motions to dismiss. Although the parties previously sought an extension of the deadline to respond to the original Complaint, this is the first request or stipulation to extend Defendants’ deadline to respond to the Amended Complaint.

On September 8, 2021, Plaintiff filed his Complaint, which named Farmers Group, Inc., Farmers Insurance Exchange, and Truck Insurance Exchange as defendants. ECF. No. 1. On November 24, 2021, the Court granted the parties’ stipulation to extend the response deadline to Plaintiff’s Complaint until January 7, 2022. ECF No. 14. The parties requested this extension to allow them time to negotiate the dismissal and substitution of certain defendant entities. *See id.* On January 7, 2022, Plaintiff filed an Amended Complaint, which dismissed Truck Insurance Exchange and named a new defendant, 21st Century Insurance Company.<sup>1</sup>

Under Rule 15(a)(3), Farmers Group, Inc. and Farmers Insurance Exchange’s deadline to respond to the Amended Complaint is currently January 21, 2022; however, because 21st Century Insurance Company is a newly added defendant, and was not served until yesterday, January 18, 2022,<sup>2</sup> its deadline to respond to the Amended Complaint, pursuant to Rule 12(a)(1)(A), is not until February 8, 2022. In good faith, for efficiency and judicial economy, and not for purposes of delay, the parties agree there is good cause to set February 8, 2022 as the deadline for all three Defendant entities to respond to the Amended Complaint. 21st Century requires sufficient time to

<sup>1</sup> Defendants maintain that Plaintiff continues to name improper entities as defendants in this action and that 21st Century is the only proper defendant.

<sup>2</sup> Defendants’ counsel accepted service on behalf of 21st Century Insurance Company on January 18, 2022.

1 respond to the Amended Complaint and is not due to respond until February 8, 2022; however,  
2 the other two Defendants are currently required to respond January 21, 2022. All three  
3 Defendants are represented by the same counsel and wish to (1) file a single motion to dismiss  
4 and (2) avoid having to file multiple motions on different days, which will likely cover the same  
5 content. The parties' proposed schedule will allow for a single combined motion and save the  
6 Court from having to adjudicate multiple overlapping motions.

7 Additionally, the parties respectfully request a modified briefing schedule for Defendants'  
8 forthcoming motion to dismiss whereby Plaintiff's response to the motion to dismiss is due  
9 March 8, 2022 and Defendants' reply is due March 22, 2022. The parties request this schedule to  
10 (1) provide them with adequate time to address all of the issues raised in this putative class action  
11 and (2) avoid deadlines falling during previously scheduled travel. There is accordingly good  
12 cause to set this requested briefing schedule.

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For these reasons, the parties stipulate that Defendants' response to the Amended Complaint shall be due on or before **February 8, 2022**. Plaintiff's response to Defendants' forthcoming motion to dismiss shall be due March 8, 2022, and Defendants' reply in support of its motion to dismiss shall be due March 22, 2022.

**IT IS SO STIPULATED.**

Respectfully submitted this 19th day of January 2022.

KIND LAW FIRM

LEWIS ROCA ROTHBERGER CHRISTIE LLP

By: /s/ Michael Kind

By: /s/ Brian D. Blakley

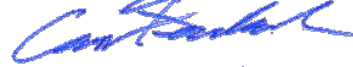
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**IT IS ORDERED.**



United States Magistrate Judge

DATED: 1-20-2022